

January 2, 2001

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street SW
Washington DC 20590-0001

Ref: Document FAA-2000-8274 -56

Gentlemen:

With reference to document FAA – 2000-8274, it appears this document is trying to add some safety to airshow events. I whole-heartedly agree with the intent of what is attempting to be done. Having airplanes flying at mock-2, mixing with the 100-knot equipment, or having a parachuter descending into the whirling blades of a helicopter is not a good mix.

I object to the document as proposed, as it will lead to the destruction of the Aerial Advertising business. The Aerial Advertising business has been serving the public at events of all sizes for decades. Any governing of air space at events should be done in such a way as to provide the airshow and the Aerial Advertisers an equal opportunity to do their job.

Paragraph 4 of the background petitions has comments that officials of Major League Baseball and other outdoor events are seeking to shut down aerial advertising, using the FAA as their avenue of getting the job done. If you read these officials correctly, this is the multi-million dollar sign boards that started showing up in the stadiums, in the 1990's. The stadiums are trying to eliminate the competition. This is not a safety or sound issue. I can not speak for the banner towers, but as far as the Electronic Aerial Night Systems are concerned, there has never been an accident or incident involving airships, helicopters or airplanes. The sound issue was addressed when we received FAA approval under our STC, as we had to do the sound testing under Rule 36 of the FAA rules, in order to obtain the STC. As a matter of information, when we were conducting the sound studies at the low altitudes per Rule 36 and passed, we decided to run the

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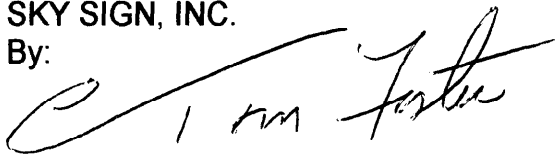
tests at the higher altitudes of 1000 feet where we operate, and the sound was not measurable.

Sky Sign has invested in excess of a half million dollars, developing an Electronic Aerial Advertising System for airplanes, airships and helicopters. Working with the FAA for years, we now have several STC (Supplemental Type Certificates), and through the FAA, we received our PMA license to manufacture the systems. We have hundreds of systems throughout the United States and the world. Any rules that would impact the use of this equipment would be a financial disaster, and would put us out of business along with all our customers.

The one thing the document does not address is the time of day. All of our activity is after dark. Everything I see in the proposed document is for daytime events. A night exemption to the rule may be the answer for us. When we received our first patent in the early 1970's and started working with the FAA, there was no place for us, so they put us in with the banner towers. With our equipment mounted on the airplane, helicopter or airship, it can not be jettisoned like the banners. With our system operating only at night, I feel we need to be exempt from what appears to be a daytime rule. Wording written into the document, addressing night operation would solve some of the objections. Please note: Due to the size and readability of the electronic sign, no waiver of flight altitude rules are required.

SKY SIGN, INC.

By:

A handwritten signature in black ink, appearing to read "C. Tom Foster". The signature is written in a cursive, flowing style with a large initial "C" and a long horizontal stroke extending to the right.

C. Tom Foster

CTF/b